

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

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FREDRIC N. ESHELMAN,

*Plaintiff,*

v.

TRUE THE VOTE, INC., CATHERINE  
ENGELBRECHT, GREGG PHILLIPS, OPSEC  
GROUP, LLC, JAMES BOPP, JR., AND THE  
BOPP LAW FIRM,

*Defendants.*

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Case No. 4:20-cv-04034

**JURY DEMANDED**

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**PROPOSED ORDER**

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ON THIS DAY CAME TO BE HEARD Plaintiff's Verified Emergency Application for Temporary Restraining Order as to All Defendants. After considering the motion, response (if any), and argument of counsel, it is the Court's opinion that the Application should be GRANTED.

It is further ordered that, for 14 days from the date of this Order, the Court:

- a. Restrains and enjoins Defendants True the Vote, Catherine Engelbrecht, Gregg Phillips, OPSEC Group, James Bopp, and The Bopp Law Firm, including their officers, agents, servants, attorneys, accountants, and any representatives acting or purporting to act on their behalf, and all persons in active concert or participation with them who receive actual notice of this Order by personal service or otherwise, and each of them from in any way directly or indirectly releasing, distributing, spending, transferring, removing, encumbering, disposing of, or otherwise paying, selling, depleting, destroying, sabotaging, or dissipating any of the \$2.5 million (representing the \$2.5 million amount that Plaintiff conditionally gave to Defendant True the Vote ), or the entire amount of the account if there is less than \$2.5 million in the accounts, in the following accounts (in the respective individual amounts below):

1. Wells Fargo Bank NA, ABA # [REDACTED]; Account Name - True the Vote; Account # [REDACTED]

- a. \$2.5 million, or the entire amount if less remains in the account
  2. OPSEC Group
    - a. \$750,000 or the entire amount if less remains in the account
  3. Fifth Third Bank; Account Name - The Bopp Law Firm; SRF# [REDACTED]; TRN# [REDACTED]
    - a. \$500,000 or the entire amount if less remains in the account
  4. Wells Fargo Bank Account NA; Account Name – Engelbrecht C Checking; Account # [REDACTED]
    - a. \$30,000 or the entire amount if less remains in the account
- b. Restrains and enjoins Defendants True the Vote, Catherine Engelbrecht, Gregg Phillips, OPSEC Group, James Bopp, and The Bopp Law Firm, including their officers, agents, servants, attorneys, accountants, and any representatives acting or purporting to act on their behalf, and all persons in active concert or participation with them who receive actual notice of this Order by personal service or otherwise, and each of them from in any way removing, destroying, concealing or otherwise altering any file, document, associated paperwork, or the like (whether a copy or original) related to Defendants, including, but not limited to, bank statements and credit card statements and any purchases made with those Eshelman Funds;
- c. Orders Defendants True the Vote, Catherine Engelbrecht, Gregg Phillips, OPSEC Group, James Bopp, and The Bopp Law Firm, including their officers, agents, servants, attorneys, accountants, and any representatives acting or purporting to act on their behalf, and all persons in active concert or participation with them who receive actual notice of this Order by personal service or otherwise, and each of them are ordered to, within 24 hours of this Order, give Plaintiff access to review and copy all paper and electronic financial records identifying any bank accounts, including their account numbers, investment accounts, or similar financial accounts into which funds from Defendant True the Vote's Wells Fargo Account # [REDACTED] after November 5, 2020 have been transferred;
- d. Orders the financial institutions associated with Defendants True the Vote, Catherine Engelbrecht, Gregg Phillips, OPSEC Group, James Bopp, and The Bopp Law Firm to (1) hold and retain within their control at least \$2.5 million of the assets, funds, accounts, or other property in the aforementioned accounts in (a)1-4, or the entire amount in the same account if the account has less than the requisite amounts in (a)1a, (a)2a, (a)3a, and (a)4a, and (2) prohibit the releasing, distributing, spending, transferring, removing, encumbering, disposing of, or otherwise paying, selling, depleting, destroying, sabotaging, or dissipating of more than \$2.5 of the aforementioned assets, funds, or accounts.

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Honorable Judge Eskridge

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Date